

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>V.</b>	)	<b>CASE NO.: 4:19-CR-00219 BRW</b>
	)	
	)	
<b>CHRISTOPHER DAVID HIGGINS</b>	)	

**MOTION TO MODIFY ORDER GRANTING TEMPORARY RELEASE**

The Defendant, Christopher David Higgins, by and through his counsel, Erin Cassinelli, states in support of his Motion for Temporary Release:

1. On February 10, 2022, this Court granted Mr. Higgins's request to be temporarily released for medical treatment.
2. Due to delayed notice to jail authorities, Mr. Higgins' will not arrive to his medical appointment until close to 4pm. The clinic advised they would still see Mr. Higgins today, but it likely will take more than an hour to complete the appointment. Higgins' family is driving from Little Rock to Helena (a two hour and seven minute drive) and then back to Little Rock, then after the appointment, back to Helena. Due to the appointment length and driving time, counsel is concerned he may not arrive back at the detention center by 7pm.
3. Mr. Higgins thus asks the Court to extend the duration of his temporary release, allowing him until 8:30pm to return to the detention center. Mr. Higgins and his family are aware that he is to go straight to the medical appointment and back to the detention center.

WHEREFORE, the Defendant, Christopher Higgins, asks the Court to grant his motion, and for any other relief the Court finds appropriate.

Respectfully Submitted,

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